FEDERAL ENERGY REGULATORY COMMISSION WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas Branch 3
Rover Pipeline LLC
Rover Pipeline Project
Docket No. PF14-14-000
§ 375.308(z)

February 11, 2015

Mr. Kelly Allen Regulatory Affairs Rover Pipeline LLC 1300 Main Street Houston, TX 77002

Re: Comments on the Second Set of Draft Resource Reports 1-12

Dear Mr. Allen:

Enclosed please find our comments on Rover Pipeline LLC's (Rover) January 26, 2015 filing of the second set of draft environmental resource reports for the planned Rover Pipeline Project (Project). Staff appreciates the opportunity to review and comment on a second set of draft resource reports. These comments ask for clarifications of discrepancies and additional information that we believe necessary to begin substantive preparation of a draft environmental impact statement for the Project. In addition, Rover should address all of the comments filed in the public record by other agencies and stakeholders regarding the draft environmental resource reports.

The enclosed comments should be addressed in the subsequent filing for this Project, as well as included in a matrix that identifies the specific locations in the resource reports (i.e., section and page number) where the information requested in these comments may be found. If any comments provided in the enclosure are addressed in another resource report, be sure to include a cross-reference in your response. Note that our comments generally do not include items that Rover has already noted as "to be provided in subsequent filings" or as "to be determined."

You should be aware that Rover needs to address all comments within the attached enclosure as well as all comments received during the scoping period. Any omission of content relevant to these comments could result in a determination that your formal application is incomplete and not ready for processing. If Rover cannot provide the

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necessary information in its application, Rover should clearly state the timing for all supplemental information.

When filing documents and maps, be sure to prepare separate volumes, as outlined on the Federal Energy Regulatory Commission's web site at http://www.ferc.gov/help/filing-guide/file-ceii/ceii-guidelines.asp. Any plot plans showing equipment or piping details or other Critical Energy Infrastructure Information should be filed as non-public and labeled "Contains Critical Energy Infrastructure Information – Do Not Release" (18 CFR 388.112). All material filed with the Commission containing location, character, and ownership information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: "CONTAINS PRIVILEGED INFORMATION--DO NOT RELEASE."

Thank you for your cooperation. If you have any questions, please call me at 202-502-6296. For all materials submitted, in addition to the copies filed with the Secretary of the Commission, please provide an electronic and hard copy directly to our third-party environmental contractor, Cardno (to the attention of Jennifer Ward).

Sincerely,

Kara Harris Environmental Project Manager Gas Branch 3

Enclosure

cc: Public File, Docket No. PF14-14-000

ENCLOSURE

Comments on the Second Set of Draft Resource Reports (RR) 1 through 12 for the Rover Pipeline Project Docket No. PF14-14-000

- 1. As previously requested on December 31, 2014, update table 1A-3 (appendix 1A) to report the distance from the Additional Temporary Work Spaces (ATWS) for each wetland or waterbody within 50 feet of an ATWS.
- 2. General Provide a table that clarifies the survey period and anticipated report completion date for the following items:
 - a. biologicals surveys;
 - b. cultural resources surveys;
 - c. geotechnical investigations; and
 - d. species-specific surveys (see comment RR3-1 below).
- 3. General Provide documentation of consultation with Columbia Gas Transmission, L.L.C. (Columbia) regarding its Leach XPress Project (PF14-23), as it appears that the rights-of-way for Columbia and Rover's projects may parallel or overlap for roughly 25 miles. Additionally, provide the following:
 - a. a table (by milepost) indicating where the rights-of-way may overlap, abut, or parallel each other (include all relevant spacing details);
 - b. a discussion of how coordination of construction and restoration efforts would be coordinated should workspaces overlap; and
 - c. any additional outreach efforts conducted by Rover in this area with stakeholders or agencies to avoid confusion between the projects.
- 4. Section 1.3 (page 1-4) Update the section to include a discussion on the need for and purpose of the bi-directional flow metering and regulating stations along the Supply Laterals.
- 5. Section 1.3 (page 1-4) and Table 1.3-3 Update the section to explicitly state the total number of meter stations that are planned for the Supply Laterals.
- 6. Section 1.3.2.2 and Table 1.3.3 (page 1-10) Clarify the status of the Michigan Consolidated Delivery point and Meter Station in Shiawassee County, Michigan now that the line intercepts with Vector in Livingston County, Michigan.

- 7. Sections 1.3.2.3 and 1.3.2.5 (page 1-11) Update the sections to provide additional details for the "Receiver Facilities" and "Launchers and Receivers" and clarify the differences between the two facilities.
- 8. Sections 1.3.2.3 and 1.3.4 (pages 1-11 and 1-12) Update the sections to reconcile the table numbers; currently the sections list two tables as 1.3-4.
- 9. Table 1.4-1 (page 1-14) Update the table, and associated text, as applicable, to reconcile the apparent omission of the Defiance Compressor Station under the aboveground facilities category for the Market Segment.
- 10. Table 1.5-1 (page 1-19) Update the table to identify the locations within the Project Area where the 30-50 permanent workers would be employed. Also, reconcile the discrepancy in the number of permanent workers between this section and section 5.2.1.2 and table 10.3.1.
- 11. Figure 1.6-1 (page 1-23) Update the figure with a legible image.
- 12. Section 1.6.1.1 (page 1-22) Define in hours, days or weeks the installation timeframe between the first 42-inch-diameter pipe and the second 42-inch-diameter pipe stated as being "directly afterward."
- 13. Section 1.6.1.5 (page 1-32) Verify that Rover has and will continue to communicate with states, counties, municipalities, individuals/communities, etc. for in-road construction and appropriate pipe depth at public and private road crossings.
- 14. Section 1.11.1 (page 1-45) Update this section to include specific information on each facility. Table 10.7-1 lists the "electrical requirements" for nine compressor stations with the minimum distances to power lines (between 0.5 to 3 miles). The connecting facilities would be considered non-jurisdictional.
- 15. Section 1.11.1 (page 1-45) Update the section and table to include the Supply Header Project (PF15-5) and Atlantic Coast Pipeline Project (PF15-6) and include a discussion of the potential overlap of the projects' routes in Doddridge County, West Virginia.
- 16. Section 1.12 (page 1-47) For each of the identified major projects that would be crossed by Rover, provide a detailed analysis of the potential cumulative effects by resource within the identified region of influence for cumulative impacts (e.g. Hydrologic Unit Code watershed [HUC]). Provide labels on figure 1C-3.
- 17. Section 1.12.1 (page 1-48) Identify the locations (by facility and milepost) of the small localized areas where construction would overlap and have common impacts.

- 18. Section 1.12.2 (page 1-49) Provide the location (facility and milepost) and analysis of wetland impacts where major cumulative projects overlap with the HUC 12, particularly focusing on individual wetland systems (identify the specific feature adversely affected by cumulative projects).
- 19. Section 12.3 (page 1-49) Identify the localized area (facility and milepost) where the locations of these projects overlap. Provide an evaluation of the cumulative effects on vegetation and wildlife resources in these areas, and avoidance or minimization measures as necessary.
- 20. Section 1.12.4 (page 1-50) Provide an analysis for "minor" and "major" projects relative to the pipelines and the aboveground facilities. Include a discussion of potential cumulative effects where projects may overlap the portions of the Project where cultural resources were found to be present.
- 21. Section 1.12.5 (page 1-50) Provide the locations where socioeconomic cumulative effects are expected to be positive (i.e., where do the cumulative benefits of the multiple projects occur?).
- 22. Section 1.12.6 (page 1-51) Identify the cumulative projects and describe those areas where cumulative effects may occur because multiple aboveground facilities are proposed in the same localized area. Provide avoidance and minimization measures as necessary. At a minimum, the gas processing plants should be described here.
- 23. Section 1.12.6 (page 1-51) A conclusion should not be based on the relative size of the geographic area, but rather the scope of the Project and cumulative effects on land use and visual resources within 0.5 mile. Revise and provide further clarification of the conclusion.
- 24. Section 1.12.7 (page 1-51) Section 1.12.6 states that multiple aboveground facilities are located in the same localized area. For each occurrence, evaluate the potential effects on air quality or noise standards with implementation of the identified cumulative projects.
- 25. Volume II, Appendix 1A (Supplemental Tables) Update and file revised tables as indicated below:
 - a. table 1A-1 (Adjacent Right-of-Way): update the Overlap field to report one value based on desired/anticipated overlap or minimum expected overlap (currently reports a range, i.e., 0-20 feet);
 - b. table 1A-3 (ATWS): update to include footnote 2;

- c. table 1A-4 (Access Roads): update to reconcile land types reported as "TBD" or include a footnote explaining how these acreages are accounted for in acreages reported in various tables throughout the RRs; and
- d. update table 1A-7 to identify the planned crossing method (i.e., a single method) for all roadways to be crossed by the Project, including private roads.
- 26. Volume II, Appendix 1B (Rover's Plan): Clarify the apparent typographical error on page 10, F.4, part h.
- 27. Volume III, Attachment 1A (Plot Plans) Update and file revised plans and associated information as indicated below:
 - a. update the plot plans to depict the facility site at a closer scale with each facility component listed in table 1A-2 clearly depicted and labeled; and
 - b. verify the type of existing structures that would be moved (i.e., residential, shed, barn, etc.) and the details of the removal (i.e., purchased from landowner, to be relocated, etc.) at the Defiance Compressor Station location, and elsewhere as applicable.

Alignment Sheets

- 1. General The Sherwood Lateral alignment sheets depict two milepost (MP) 1 mile markers (one at MP 1 and another at what should be MP 2). Update Sherwood Lateral alignment sheets and corresponding tables to reference the appropriate mileposts.
- 2. General Update the alignment sheets to ensure streams, creeks, and wetlands are consistently labeled or depicted.
- 3. General Update the corresponding tables or alignment sheets to reconcile the following discrepancies.
 - a. The following are inconsistencies between table 1A-1 and the alignment sheets:
 - i. update all alignment sheets to include the specific Operator names for power lines, as listed in table 1A-1;
 - ii. Sherwood Lateral: the adjacent pipeline listed from MP 0.10 to 0.17 is not labeled or marked on the alignment sheet;
 - iii. Sherwood Lateral: the Union Carbide Pipeline listed from MP 8.89 to 9.04 is labeled on the alignment sheet as Miss Utility of West Virginia Pipeline;

- iv. Sherwood Lateral: the Consol Energy Pipeline listed from 14.28 to 14.47 is labeled as "Foreign Pipeline" on the alignment sheet;
- v. Sherwood Lateral: the Consol Energy Pipeline adjacent to the Sherwood Lateral near MP 8.8 to 4.85 is not listed in the table;
- vi. Sherwood Lateral: the Foreign Pipeline near MP 28.9 to 28.95 adjacent to the Sherwood Lateral is not listed in the table;
- vii. Sherwood Lateral: the Eureka Hunter Pipeline listed between MP 37.31 to 37.77 is also adjacent to the Sherwood Lateral between (approximately) MP 38.01 to 38.04, which is not listed in the table;
- viii. Seneca Lateral: the Texas Eastern Pipeline listed between MP 23.01 to 23.13 is not on the alignment sheet it potentially needs to be changed to "transmission line";
- ix. Berne Lateral: the table indicates a break in the existing Blue Racer Midstream Pipeline right-of-way between MP 0.45 to 0.53, which is not reflected in the alignment sheet. Rather, the Blue Racer Midstream Pipeline shows as contiguously adjacent on the alignment sheet from MP 0.19 to 0.87;
- x. Berne Lateral: the Unknown Pipeline listed in the table between MP 2.49 to 3.24 is labeled as Texas Eastern Pipeline;
- xi. Clarington Lateral: The East Ohio Gas Company Pipeline listed in the table between MP 0.69 to 1.59 is labeled in the alignment table as Dominion Pipeline;
- xii. Clarington Lateral: an East Ohio Gas Company Pipeline between MP 11.1 to 11.2 is not listed in the table;
- xiii. Clarington Lateral: the Dominion Pipeline listed in the table between MP 11.44 and 12.53 is labeled on the alignment sheet as Eastern Ohio Gas Company Pipeline;
- xiv. Clarington Lateral: the Dominion Pipeline listed in the table between MP 13.05 to 15.10 is from MP 13.05 to 13.15 on the alignment sheet;
- xv. Clarington Lateral: an East Ohio Gas Company Pipeline between approximately MP 13.2 to 13.8 is on the alignment sheet but is not in the table;
- xvi. Clarington Lateral: an East Ohio Gas Company Pipeline between approximately MP 13.9 to 15.4 is on the alignment sheet but not in the table;
- xvii. Clarington Lateral: the East Ohio Gas Company Pipeline listed in the table between MP 15.10 to 18.20 begins around MP 15.45 on

- the alignment sheet. At MP 16.5 through 16.8, the name changes to Blue Racer Midstream Pipeline;
- xviii. Clarington Lateral: the East Ohio Gas Company Pipeline listed in the table between MP 18.88 to 21.29 is actually broken up into the following: Dominion Pipeline from MP 18.88 19.1, Blue Racer Midstream Pipeline between MP 19.1 to 19.5, East Ohio Gas Company Pipeline between 19.5 to 20.2, and East Ohio Gas Company Pipeline between 20.25 to 21.29;
- xix. Clarington Lateral: the Transmission Line listed in the table between MP 29.17 to 29.76 ends around MP 29.27 on the alignment sheet;
- xx. Majorsville Lateral: The Unknown Pipeline listed in the table between MP 1.94 to 2.18 is not labeled on the alignment sheet;
- xxi. Majorsville Lateral: the Columbia Gas Pipeline listed in the table between MP 11.06 to 11.51 looks to end near MP 11.2 on the alignment sheet;
- xxii. Majorsville Lateral: the Dominion Pipeline listed in the table as between MP 20.45 to 20.92 is labeled as East Ohio Gas Company Pipeline and should end near MP 20.7;
- xxiii. Supply Connector Lateral: the end milepost of the Access Midstream Pipeline looks to be around 8.5 according to the alignment sheet, not 8.02 as is listed in the table;
- xxiv. Burgettstown Lateral: the Unknown Pipelines listed in the table between MP 0.37 to 0.54, MP 1.82 to 2.72, MP 3.13 to 3.33, and MP 4.22 to 4.51 are not labeled in the alignment sheet;
- xxv. Mainlines A and B: the Unknown Foreign Pipeline listed in the table between MP 22.46 to 22.92 is labeled as Midstream Pipeline on the alignment sheet;
- xxvi. Market Segment: the Merit Energy Pipeline listed in the table between MP 170.89 to 171.56 is labeled as Foreign Pipeline on the alignment sheet;
- xxvii. Market Segment: the Merit Energy Pipeline listed in the table between MP 171.56 to 172.35 is not on the alignment sheet;
- xxviii. Market Segment: the Great Lakes Gas Pipeline listed on the table between MP 172.35 to 173.39 is labeled as Foreign Pipeline on the alignment sheet;
- xxix. Market Segment: the Merit Energy Pipeline listed in the table between MP 173.39 to 173.96 is labeled as Foreign Pipeline on the

- alignment sheet, and appears to begin at MP 173.7 and end at MP 175.17 on the alignment sheet;
- xxx. Market Segment: the Merit Energy Pipeline listed in the table between MP 176.02 to 178.20 is labeled as Foreign Pipeline on the alignment sheet; there is also a break in the pipeline on the alignment sheet from MP 176.5 to 176.7;
- xxxi. Market Segment: the Merit Energy Pipeline listed in the table between MP 178.44 to 178.83 is labeled as Foreign Pipeline on the alignment sheet;
- xxxii. Market Segment: the Merit Energy Pipeline listed in the table between MP 183.10 to 183.97 is labeled as Foreign Pipeline on the alignment sheet;
- xxxiii. Market Segment: the Transcanada Pipeline listed in the table between MP 188.52 to 190.22 appears to end at MP 189.7;
- xxxiv. Market Segment: the Great Lakes Gas Pipeline listed in the table between MP 198.60 to 199.73 is labeled as Foreign Pipeline on the alignment sheet;
- xxxv. Market Segment: the Great Lakes Gas Pipeline listed in the table between MP 200.44 to 200.76 is labeled as Foreign Pipeline on the alignment sheet;
- xxxvi. Market Segment: the Great Lakes Gas Pipeline listed in the table between MP 203.48 to 205.55 is labeled as Foreign Pipeline on the alignment sheet;
- xxxvii. Market Segment: the ITC power line listed in the table between MP 82.76 to 85.71 is not on the alignment sheet until MP 83.9;
- xxxviii. Market Segment: the ITC power line listed in the table between MP 87.41 to 87.54 is not on the alignment sheet;
- Market Segment: the ITC power line listed in the table between MP 90.44 to 94.21 is not on the alignment sheet from MP 93.2 to 93.4;
- xl. Market Segment: the ITC power line listed in the table between MP 94.21 to 98.62 is on the alignment sheet from MP 94.9 to 95.1;
- xli. Market Segment: the ITC power line listed in the table between MP 99.15 to 102.38 is not on the alignment sheet from MP 98.7 to 99.2;
- xlii. Market Segment: the ITC power line listed in the table between MP 105.9 to 108.98 is on the alignment sheet from MP 106.3 to 108.98; and

- xliii. Market Segment: the Transmission Line listed from MP 193.42 to 194.81 is not on the alignment sheet.
- b. The following are inconsistencies between table 1A-3 and the alignment sheets:
 - i. Burgettstown Lateral: the dimensions for the ATWS at MP 7.53 and 7.63 have un-needed decimal places within the table;
 - ii. Burgettstown Lateral: the Pipeline on alignment sheet 51 at MP 47.48 is labeled as "Foreign Pipeline" but identified as "Access Midstream" in table 1A-3;
 - iii. Seneca Lateral: Pipeline crossed on sheet 1 is listed as "ATERO RESOURCES PIPELINE", but identified as "ANTERO RESOURCES PIPELINE" in table 1A-3;
 - iv. Seneca Lateral: ATWS at MP 2.59 is listed as 25 x 2430 in table 1A-3, but appears as 15 x 2430 on alignment sheet 4;
 - v. Seneca Lateral: table 1A-3 includes unreadable text in the justification for the ATWS at MP 20.16;
 - vi. Clarington Lateral: ATWS areas listed in table 1A-3 for MP 0.18 and 0.24 are listed in the table but not shown on the alignment sheets;
 - vii. Clarington Lateral: full extent of ATWS at MP 6.37 is not shown on the alignment sheets;
 - viii. Clarington Lateral: road crossed at MP 23.63 is identified as CR 331 in table 1A-3, but the alignment sheets identify the road as "State HWY 33 (St. Clairsville St)";
 - ix. Mainlines A and B: ATWS's of 50x300 and 30x150 for horizontal directional drill (HDD) at MP 25.5 are shown on the alignment sheets but not in the table;
 - x. Mainlines A and B: ATWS at MP 31.38 listed in table 1A-3 as 15x325, but appears on the alignment sheets as 15x350;
 - xi. Mainlines A and B: ATWS for MP 31.56 listed in table 1A-3 as 15x1365, but appears on the alignment sheets as 15x1000;
 - xii. Mainlines A and B: ATWS of 50x300 for HDD at MP 42 shown on the alignment sheets but not in table 1A-3;
 - xiii. Mainlines A and B: ATWS of 50x300 at MP 83.5 is shown on the alignment sheets but not in the table;
 - xiv. Mainlines A and B: full extent of false right-of-way, ATWS at MP 91.98 and 94.90 are not shown on the alignment sheets;

- xv. Majorsville Lateral: ATWS's of 25x285 and 10x430 near MP 0.5 are shown on the alignment sheets but not identified in table 1A-3;
- xvi. Majorsville Lateral: full extent of ATWS 50x1325 at MP 12.47 needs to be shown on the alignment sheets;
- xvii. Berne Lateral: ATWS at MP 3.55 is listed in table 1A-3 as 25x245 but appears on the alignment sheets as 15x245; and
- xviii. CGT Lateral: ATWS at MP 4.17 is listed in table 1A-3 as 10x100 but appears on the alignment sheets as 15x100.
- c. The following are inconsistencies between table 1A-4 and the alignment sheets:
 - i. depict temporary access roads and permanent access roads with different colors or symbols on the alignment sheets;
 - ii. Sherwood Lateral: table 1A-4 lists access road "WV-DO-SHC-001.970-PAR-1" but it is not shown on the alignment sheets;
 - iii. Cadiz Lateral: Access road "OH-HA-MC-002.970-PAR-1A" is listed in table 1A-4 but is not shown on the alignment sheet. Additionally, verify that the width of 100 feet that is listed in the table is accurate;
 - iv. Burgettstown Lateral: access roads "PA-WA-034.000-PAR-1" and "PA-WA-044.000-PAR-2" are on the alignment sheets (sheets 1 and 3) but are not found in table 1A-4;
 - v. Clarington Lateral: access road "OH-BE-CC-079.970-TAR-13C" shown on the alignment sheet near MP 15.75, but not found in table 1A-4:
 - vi. Clarington Lateral: access road "OH-HA-CC-025.970-TAR-23" shown on the alignment sheets near MP 31.75, but is not found in table 1A-4:
 - vii. Mainlines A and B: the following access roads are listed in table 1A-4 but do not appear on the alignment sheets: OH-CA-001.000-PAR-3, OH-WA-037.000-PAR-6, OH-WA-099.000-PAR-8;
 - viii. Mainlines A and B: the access road in table 1A-4 identified as OH-CA-022.000-TAR-9 actually refers to a corresponding map feature OH-CR-044.000-TAR-8;
 - ix. Mainlines A and B: access road identified as OH-AS-043.00-TAR-13 in table 1A-4 matches map features "Access Road TA-12";
 - x. Market Segment: access road MI-LA-081.000-TAR-16 is listed in table 1A-4, but does not appear on the alignment sheets;

- xi. Majorsville Lateral: access road WV-MA-ML-001.970-PAR-1 is listed in table 1A-4 but not shown on the alignment sheet;
- xii. Majorsville Lateral: access road WV-MA-ML-010.970-TAR-1C is shown on the alignment sheet, but not found in table 1A-4;
- xiii. Supply Lateral A and B: update the name for access road OH-HR-003.000-PAR-1 on the alignment sheet to match the identifier listed in table 1A-4;
- xiv. Supply Lateral A and B: access road OH-HR-029.000-PAR-2 shown on the alignment sheets but not found in table 1A-4;
- xv. Supply Lateral A and B: access road OH-HR-042.545-TAR-6 is listed in table 1A-4, but the corresponding feature on the alignment sheets is identified as OH-HR-042.545-TAR-10; and
- xvi. Supply Lateral A and B: access road OH-HR-042.570-TAR-7 is listed in table 1A-4, but the corresponding feature on the alignment sheets is identified as OH-ST-018.000-TAR-7.
- d. The following are inconsistencies between table 1A-8 and the alignment sheets:
 - i. private roads and driveways are not included in table 1A-8 and are not consistently recorded on the alignment sheets. Examples include Clarington lateral MP 24.3, MP 24.7, MP 31.6, and Majorsville Lateral MP 0.3 (distances are approximate). All driveways and private roads should be clearly marked on the alignment sheets and included in table 1A-8;
 - ii. Clarington Lateral: at MP 18.12, table 1A-8 lists "TWP 272 (Roscoe RD)," but it is listed on the alignment sheet as "CR 272 (Roscoe RD)." Reconcile TWP and CR;
 - iii. Clarington Lateral: at MP 27.36, table 1A-8 lists "WP 254 (Jockey Hollow Road)," but it is listed on the alignment sheet as "CR 254 (Jockey Hollow Road)." Reconcile TWP and CR;
 - iv. Majorsville Lateral: at MP 0.43, table 1A-8 lists "CR 26 (Number 2 Ridge Rd)," but the it is not listed on the alignment sheet;
 - v. Majorsville Lateral: at MP 4.0, table 1A-8 lists "CR 713 (Lower Stull Road)," but it is listed on the alignment sheet as "CR7/3 (Lower Stull Road)." Reconcile the difference in the road name;
 - vi. Majorsville Lateral: at MP 7.26, table 1A-8 lists "SR 88," but it is listed on the alignment sheet as "State HWY 88." Reconcile HWY and SR;

- vii. Cadiz Lateral: at MP 1.47, table 1A-8 lists "CR509 (Freeman Rd)," but it is listed on the alignment sheet as "TWP 270 (Freeman Road)." Reconcile TWP and CR;
- viii. Cadiz Lateral: at MP 2.66, table 1A-8 lists "US HWY 22 (Cadiz Piedmont Rd)," but it is listed on the alignment sheet as "SR HWY 22 (Cadiz Piedmont Rd)." Reconcile SR and US;
- ix. Cadiz Lateral: at MP 2.85, table 1A-8 lists "CR 269 (Konaski Rd)," but it is listed on the alignment sheet as "TWP 269 (Kanoski Rd)." Reconcile TWP and CR;
- x. Burgettstown Lateral: In table 1A-8, township roads are abbreviated inconsistently. Sometimes it is "T" sometimes it is "TWP" and sometimes it is "TR":
- xi. Burgettstown Lateral: at MP 3.7 (approximately), Shovel Road is not listed in either the table or the alignment sheets;
- xii. Burgettstown Lateral: at MP 9.9, on the alignment sheet, TWP road 869 (Aunt Clara Road) is listed as crossing the right-of-way in two different locations and within 0.1 of mile. However, only one road is depicted on the aerial photography at the designated crossings;
- xiii. Burgettstown Lateral: at MP 17.53, table 1A-8 lists "T 246," but it is listed as "CR 246" on the alignment sheet. Reconcile between T and CR;
- xiv. Burgettstown Lateral: at MP 28.45, table 1A-8 lists "CR 260 (Hidden Acres Dr)," but it is listed on the alignment sheet as "Private Road":
- xv. Burgettstown Lateral: at MP 39.65, table 1A-8 lists "CR 35 Branch Rd," but it is listed on the alignment sheet as "CR 35 (Branch Creek)." Reconcile the road name;
- xvi. Burgettstown Lateral: at MP 43.94, table 1A-8 lists "CR 61 (Charlon Rd)," but it is listed on the alignment sheet as "CR 35 (Chalon Rd)." Reconcile the road name;
- xvii. Burgettstown Lateral: at MP 49.53, table 1A-8 lists "SR 164 (Amsterdam Rd SW #2)," but it is listed as a "CR 164…" on the alignment sheet. Reconcile between SR and CR;
- xviii. Burgettstown Lateral: at MP 49.68, table 1A-8 lists the "Wheeling & Lake Erie RR," but it is not listed on the alignment sheet;
- xix. Supply Connector Lateral: at MP 42.17, table 1A-8 lists the "Buckeye trail," but it is not listed on the alignment sheets;

- xx. Mainlines A and B: at MP169.62, table 1A-8 lists the "CSTX Railroad (NY Central Lines)," but it is not listed on the alignment sheet;
- xxi. Market Segment: at MP 16.58, table 1A-8 lists an abandoned railroad, but it is not listed on the alignment sheet;
- xxii. Market Segment: at MP 40.04, table 1A-8 lists "W Cadmus Rd," but it is listed on the alignment sheet as "SR M-34 (West Cadmus Rd)." Reconcile the road name;
- xxiii. Market Segment: at MP 89.99, table 1A-8 lists "Emu Drive," but it is not listed on the alignment sheets;
- xxiv. Market Segment: at MP 93.34, table 1A-8 lists "W Schafer Rd," but it is listed on the alignment sheets as "Schafer." Reconcile the road name;
- xxv. Market Segment: at MP 200.42, table 1A-8 lists "Trumble Rd," but it is listed on the alignment sheets as "Trumble Lane." Reconcile the road name;
- xxvi. Market Segment: at MP 207.4, table 1A-8 lists "Indian Trail," but it is listed on the alignment sheets as "King Road." Reconcile the road name;
- xxvii. Sherwood Lateral: at MP 3.6 (approximately), alignment sheet shows "Smith Run RD" crossing the right-of-way, but it is not listed in table 1A-8;
- xxviii. Sherwood Lateral: at MP 9.75, table 1A-8 lists CR "60/2 (Sandy Creek Rd)" but it is listed on the alignment sheet as "CR 60/2 (Shade Rd)." Reconcile the road name; and
- xxix. Sherwood Lateral: at MP 37.44, table 1A-8 lists "TWP 490 (Brey Hollow Road)," but it is listed on the alignment sheet as "CR 490." Reconcile the road name.

- 1. Address the following Scoping Comments that were not included in the January filing:
 - a. Multiple, including C423-2 Comments raised concerns for Project-related impacts on drinking water wells;
 - b. C808-5 Comment raised concerns for impacts on vernal ponds/pools that occur within the Project area; and

- c. C1087-4 Comment raised concerns that new waterlines would not be allowed to be constructed through the Project right-of-way.
- 2. Section 2.0 (page 2-2) Provide documentation of all wetland/waterbody permit applications submitted to the U.S. Army Corps of Engineers, Ohio Environmental Protection Agency, and Michigan Department of Environmental Quality (MDEQ), and a summary of Rover's proposed compensatory mitigation.
- 3. Section 2.1.1 (pages 2-2 to 2-6) Provide a table of aquifers crossed by the Project that includes the following information:
 - a. crossing location(s) of each aquifer (start and end Project MPs of crossing);
 - b. type (e.g., surficial, glacial, bedrock);
 - c. approximate depth to aquifer from ground surface (in feet);
 - d. average yield (in gallons per minute [gpm]);
 - e. current and projected use;
 - f. water quality and any known or suspected contamination;
 - g. denote principal aquifers or clarify if no principal aquifers are crossed; and
 - h. planned protection measures for shallow aquifers.
- 4. Section 2.1.2 (page 2-6) Identify aquifers that would be crossed by the Project that are enrolled in state-designated programs or clarify that no state-designated aquifers would be crossed. Programs of interest may include state-designated significant recharge areas, or other critical areas where excessive use of groundwater poses a threat to the long-term integrity of a water-supply source, or preservation areas to protect natural resources including public water supply sources.
- 5. Table 2.2-1 (page 2-12) and appendix 2A (table 2A-4) The number of Intermediate and Minor waterbody crossings in table 2.2-1 differs from the numbers provided in appendix 2A (table 2A-4). Reconcile the differences, or update and file tables with appropriate footnotes to explain the difference.
- 6. Tables 2.2-1 and 2.3-1(pages 2-12 and 2-24) and appendix 2A (tables 2A-4 and 2A-9) Upon completion of surveys, provide updated tables to include the information for the remaining approximately 16 percent of waterbodies and wetlands that had not been surveyed as of the January 26, 2014 filing.
- 7. Section 2.2.2 (page 2-11) and attachment 1A Drainage features are defined in the section as waterbodies and are depicted with purple lines on the alignment sheets; however, drainage features are not listed as waterbody crossings in table 2A-4. Verify whether or not the drainage features portrayed on the alignment

- sheets are considered to be waterbodies, and revise the applicable text and tables to reflect the appropriate crossings.
- 8. Section 2.2.4 (page 2-18) and appendix 2A (table 2A-4) Section 2.2.4 states that six waterbodies would be crossed by Mainline B only, while table 2A-4 states that three waterbodies would be crossed by Mainline B only. Clarify this discrepancy.
- 9. Section 2.2.5 (page 2-19) Section 2.2.5 indicates that there would be no permanent impacts on open water. However, table 8A-2 reports about 15 acres of permanent impacts on open water. Provide a discussion on the nature of impacts for these acres of open water.
- 10. Section 2.2.6 (page 2-20) Provide the rates (in gpm) for all hydrostatic test water withdrawals or include a statement that withdrawals would not exceed a certain rate.
- 11. Section 2.3 (page 2-21) Provide documentation of permitting agency correspondence/ consultation regarding wetland surveys and delineations.
- 12. Table 2.3-1 (page 2-24) and appendix 2A (table 2A-9) Reconcile acreage discrepancies between the two tables (i.e., permanent and total acreages).
- 13. Appendix 2A (table 2A-4) Update and file the table per the following:
 - a. include waterbodies crossed by the CGT Lateral or clarify that no waterbodies would be crossed; and
 - b. consistently denote waterbodies that would be crossed by the HDD method (*).
- 14. Appendix 2A (table 2A-4) and section 3.1.2 Update the table and/or text in the section to rectify the following discrepancies:
 - a. Burgettstown Lateral, Kings Creek Crossing is discussed in the section as being crossed at MP 9.5; but the table lists the crossing at MP 6.39; and
 - b. Burgettstown Lateral, Aunt Clara Fork is discussed in the section as being crossed at MP 10.6; but the table lists the crossing at MP 8.87.
- 15. Appendix 2A (tables 2A-4 and 2A-5) Provide waterbody identifiers for all waterbodies listed in the tables, or include a footnote that the waterbody identifier is pending completion of field delineations. Revise the alignment sheets to identify and delineate all waterbodies listed in the tables.
- 16. Appendix 2A (tables 2A-5) Add Aunt Clara Fork (Washington County, Pennsylvania) to the table as an Approved Trout Water.

- 17. Appendix 2A (table 2A-9) Revise the table to report total length of wetland crossings consistently for wetlands within the right-of-way but not crossed by the centerline and add a footnote describing how these lengths were derived.
- 18. Appendix 2A and attachment 1A (alignment sheets) Resolve the following discrepancies between appendix 2A tables and the alignment sheets:
 - a. Table 2A-4
 - i. the table lists the crossings of waterbodies S3ES-MA-128 and S1ES-BE-158 as occurring at MP 1.29; however, the alignment sheets show that waterbodies would be crossed at MP 9.67 and MP 16.61, respectively;
 - ii. waterbody S2TB-WA-100 in the table is labeled as Waterbody 2TB-WA-100 in the alignment sheets;
 - iii. the table is inconsistent with the alignment sheets as to the locations of waterbody crossings that would take place along Mainline B;
 - iv. the Belle River HDD (according to the table) is identified as the Kronner Road HDD in the associated Site-Specific HDD Crossing Plan;
 - v. Waterbody S2K-LE-227 is labeled as "Raisin River" in the table and "Hazen Creek" on the alignment sheet;
 - vi. Waterbody S2K-MA-331 is labeled as "Shaver Drain" in the table and "Ashery Creek" on the alignment sheet;
 - vii. there is a Site-Specific HDD Crossing Plan for Lake at Vines Road (Market Segment, approximate MP 95). This crossing is not listed in the table; and
 - viii. there is a waterbody at MP 71.63 of the Market Segment that appears on the alignment sheet; however, it is not labeled and does not appear in the table.

b. Table 2A-9 –

- i. the labels are not accurately linked to the correct feature (e.g., W4ES-CA-151 and W7H-WA-168 labels do not point to the respective wetlands);
- ii. missing labels (e.g., W4ES-CA-254, W2TB-MO-140);
- iii. W2ES-HR-260 in the table but is labeled as W2ES-HR-261 on the alignment sheet; and
- iv. W6H-RI-101 is shown as Palustrine forested in the alignment sheet and Palustrine shrub in the table.

- 19. Attachment 1A (alignment sheets) Revise the alignment sheets and associated text and tables to account for the following discrepancies:
 - a. there are aquatic features along the Market Segment that appear to be crossed using the HDD method that are not delineated (i.e. the Delapp Lane HDD [~MP 86], the CR D32 [Patterson Lake Road] HDD [~MP 86], and the Swamp near Jewel Road HDD [~MP 97]);
 - b. erroneous or duplicate symbology for water resources appear on the alignment sheets. In addition, some symbology is missing (e.g., waterbodies S2TB-JE-282 and S1M-WA-151);
 - c. there are several waterbody features that appear to cross the right-of-way; however, the delineation is truncated at the edge of the pipeline corridor and therefore is not classified as a waterbody crossing (e.g., S4H-CR-158, Mainline, ~ MP 114.3); and
 - d. some labels are pointing to the incorrect features (e.g., waterbody S1K-WA-173), and other labels are not visible (e.g., waterbody S2ST-JE-108 is obscured by another feature's label).
- 20. Volume IIB 2A M1 (page 2) Wetland Delineation Report Table 1 Waters of the U.S. Delineation Report for MDEQ, Jackson, East Lansing District table 1 was not provided.

- 1. General Provide details of pending surveys, survey results, federal and state agency correspondence, and Project-specific impact avoidance, minimization, mitigation, and conservation measures for listed species and species of concern including:
 - a. section 3.4.1.4 (p 3-22): eastern massasauga;
 - b. section 3.4.1.4 (p 3-23): eastern hellbender;
 - c. section 3.4.1.5 (p 3-24, 3-26): Snuffbox Mussel (*Epioblasma triqueta*), White Catspaw Mussel (*Epioblasma obliquata perobliqua*) and Northern Riffleshell (*Epioblasma torulosa rangiana*);
 - d. section 3.4.2 (p 3-27): West Virginia listed mussel species in accordance with the West Virginia Mussel Survey Protocol, March 2014 version;
 - e. section 3.4.2 (p 3-27): stalked bulrush (*Scirpus pedicellatus*), heartleaf meehania (*Meehania cordata*), and snow trillium (*Trillium nivale*);
 - f. section 3.4.2 (p 3-28), attachment 1D (PDF page 235): Ohio and Michigan listed threatened, endangered, species of concern and sensitive species; and

- g. Attachment 1D (PDF page 186): Ohio Department of Natural Resources (ODNR) identified tree species that have relatively high value as potential Indiana Bat roost trees.
- 2. Section 3.1.1 (page 3-3) This section only designates Pennsylvania with freshwater warmwater fisheries. Include Pennsylvania as part of the Project area that includes both freshwater warmwater fisheries and coldwater fisheries (e.g., Kings Creek in Washington County, Pennsylvania is listed as coldwater fisheries in appendix 2A, table 2A-4).
- 3. Section 3.1.2.1 (page 3-4) Provide correspondence, including discussions about trout stocking, with West Virginia Department of Natural Resources regarding the crossing of Wheeling Creek at MP 2.8, and update the corresponding reference.
- 4. Section 3.1.2 Kings Creek and Aunt Clara Fork are a designated Approved Trout Water/Coldwater Fishery. In addition, ODNR recommends impacts to designated coldwater habitats be avoided. The section identifies 24 coldwater habitat streams. Currently none of these waterbodies are proposed to be crossed via the HDD method; therefore provide a discussion on the specific avoidance/minimization measures or time-of-year restrictions that would be employed for these sensitive crossings.
- 5. Section 3.1.2.3 (page 3-4) Provide additional detail for the 24 coldwater habitat streams in Ohio to designate which streams are classified as either "Coldwater Habitat inland trout streams", or "Coldwater Habitat native fauna".
- 6. Section 3.2.1 (page 3-7) Revise section 3.2.1 to discuss existing vegetative resources by vegetation type (e.g. upland forest, forest wetland, emergent and scrub shrub wetland, upland open land, etc.) instead of by ecoregion.
- 7. Section 3.2.3 (page 3-12) Provide a table quantifying the acreages of each vegetative community affected by the Project. This table should correspond to the vegetation community types presented in Resource Report 3, appendix A table 3A-2 Vegetation Community Types and Representative Plant Species. Include impacted acreages by state and Project component.
- 8. Section 3.5.1 (p 3-31) Provide documentation of continuing consultation with the U.S. Fish and Wildlife Service regarding pipeline-related impacts on migratory bird species and Project-specific conservation measures for migratory birds.

- 1. As previously requested on December 31, 2014:
 - a. RR4-3: Include the Correspondence from the White Earth Band of Minnesota Chippewa Tribe from January 12, 2015;
 - b. RR4-10: The Ohio and Erie Canal is identified in the RR, but not included in the appendix 4A table. Include a discussion of the canal's significance and how it is being avoided; and
 - c. RR4-12: Provide any State Historic Preservation Office (SHPO) comments on the Unanticipated Discoveries Plans.
- 2. General Provide the SHPOs' comments on the Cultural Resource Technical Reports, when available.
- 3. General Update the section to reflect the follow-up activities Rover has conducted with the tribes.
- 4. Section 4.4
 - a. Verify Rover would avoid all National Register of Historic Places-eligible sites.
 - b. Explain how Rover would avoid adverse effects to architectural resource CAR0266012 (1843 Federal House) (e.g., relocate Mainline Compressor Station 1 in Ohio).
 - c. Clarify whether or not Rover would avoid the unevaluated deep testing areas/sites in West Virginia.
- 5. Sections 4.6.1, 4.6.2, 4.6.3, and 4.6.4 Update the sections to state that the reports were provided to the SHPOs on January 26, 2015.
- 6. Section 4.6.5 Provide any previously unfiled correspondence with the Native American tribes contacted.
- 7. Section 4.8 The section indicates that the reports were submitted to "Native American tribes, and other consulting parties as appropriate." Clarify whether or not this has been done, and if so, identify the recipients of the reports. Ensure that Native American tribes receive any requested information or reports.
- 8. Attachment 4A Provide the February 5, 2015 email sent to the canal societies, and any resulting comments.

- 9. Appendix 4A Provide a table for outstanding surveys by milepost and pipeline segment(s) (or include a milepost column in the existing tables).
- 10. Appendices 4A-1, 4A-2, and 4A-3 Provide the report references footnote.
- 11. Appendix 4A and Appendix 4B Resolve contact lists inconsistencies: The Lac Vieux Desert Band of Lake Superior Chippewa are listed in contacts in appendix 4B on page 13, but are not listed in groups contacted in appendix 4A pages 37-38.
- 12. Appendix 4A Update temporary site number in table 4A-5 on page 9 to 36WH1693.
- 13. Appendix 4A and Attachment 4F Resolve inconsistencies between the number of sites in table 4A-6 on pages 10-14 in appendix 4A and the number of sites identified in attachment 4F on page i and page 437.
- 14. Appendix 4A and Attachment 4G Resolve inconsistencies between the number of sites in table 4A-7 on pages 15-18 in appendix 4A and the number of sites identified in attachment 4G on page ii and page 15-1.
- 15. Appendix 4A and Attachment 4G Resolve inconsistencies between the number of architectural properties in table 4A-11 on pages 26-31 in appendix 4A and the number of architectural properties identified in attachment 4G on page ii.
- 16. Appendix 4B Resolve inconsistencies between figure 1.2 (mapping) which depicts the CGT and Sherwood Laterals as 100 percent complete, and table 4A-1 which indicates 96 percent and 98 percent respectively.
- 17. Volume IV Update the Cultural Resource Reports as follows:
 - a. provide the addendum survey reports (required due to denied access/unfinished surveys), and any evaluation reports (both archaeological and architectural) when available; and
 - b. update all site tables and route mapping to include Project mileposts.

- 1. Provide an estimate of total local capital expenditures, (i.e., purchases made by contractors for construction and/or restoration equipment or materials).
- 2. Section 5.2.1.1 (p 5-4) Provide additional detail regarding Rover's proposed workforce composition. Specifically, identify how Rover would fulfill its proposal to hire local workers for various project activities. As necessary, identify what trades are likely to compose the local workforce.

- 3. Section 5.2.3.1 (page 5-6) and Appendix 5A Table 5A-9 Remove the total Project expenditures listed next to the counties or replace them with expected local expenditures within those counties.
- 4. Section 5.2.3.1 (page 5-6) Provide an estimate of the total taxes that would be paid on direct expenditures during construction and provide a breakdown by federal, state and local taxes.
- 5. Section 5.2.4 Provide additional detail regarding Rover's discussion of public services in the project area. At a minimum, provide supporting evidence that existing services can absorb any demands created by the influx of workers.
- 6. Section 5.2.5.1 (page 5-8) Develop a Residential Access and Traffic Management Plan. The Plan should detail mitigation of impacts associated with in-road construction, including prior notification and maintained access for home and/or business owners and emergency response vehicles, measures to assure construction personnel utilized permitted roads only, and post construction actions associated with cleanup and repair of roads damaged. Details on mitigation should address:
 - a. increased traffic, detours, and road closures;
 - b. compaction;
 - c. prior notification;
 - d. maintaining access for home or business owners;
 - e. in-road work relative to peak-traffic periods;
 - f. safety measures (including signage, fencing and assurance of immediate back fill of trenches);
 - g. noise impacts; and
 - h. timing of and assurance for the completion of any necessary road repairs due to construction activities.
- 7. Section 5.3 (p 5-12) Update the section to address the fact that the majority of counties crossed (78 percent) are below the poverty levels of their respective state.
- 8. Table 5A-7 Update the table to reconcile the discrepancy in the peak construction workforce numbers; the individual numbers do not sum to the total.

- 1. As previously requested on December 31, 2014:
 - a. RR6-6: Update the table to include information on permitted but not yet active mines and wells. Also update the table to include the distance and direction from underground mines to the Project;
 - b. RR6-7: Update the table to include a definition of or explanation for the use of 'unknown' for well type;
 - c. RR6-8: Update the section to include a discussion of potential impacts or mitigation measures related to areas of hard bedrock and provide a Blasting Plan; and
 - d. RR6-11: Provide a map of historic landslides in the Project area.
- 2. Address the following Scoping Comments not addressed in the January filing:
 - a. DE-31: Comment raises concerns for Trenton limestone karst formation; and
 - b. DE-32: Comment raises concerns for abandoned oil wells with unknown locations and mitigation measures.
- 3. General Provide sources for all tables and statements of facts presented in the section.
- 4. General Update the section and corresponding tables to include the following information for access roads, contractor yards, mainline valves (MLV), and ATWS:
 - a. physiographic information such as relief, steep slopes, surficial geology, and bedrock geology; and
 - b. geologic hazards including soil liquefaction, landslides/steep slopes, subsidence, karst terrain, flooding, and any other recognized hazards that could affect proposed Project construction or operation.
- 5. Section 6.1 (page 6-2) Provide general information for the Supply Lateral segments. Provide general topographic relief and elevations for the Mainlines A and B and the Market Segment.
- 6. Section 6.1 (page 6-2) Provide a discussion of the physiography, elevations, slopes, and general conditions for aboveground facilities.
- 7. Section 6.2.1 (page 6-8) Revise table 6.2.1 to include all mines (include coal mines both surface and underground) located within 0.25 mile and the number of total wells within 0.25 mile of the Project by county.

- 8. Section 6.2.1 (page 6.8) Provide a list of underground mines within 0.25 mile of the Project. Include the:
 - a. distance and direction from the Project;
 - b. state in which it is located;
 - c. associated pipeline segment;
 - d. beginning and ending Project mileposts at which each mine is located;
 - e. mine name;
 - f. resource being mined; and
 - g. current use status.
- 9. Section 6.2.1 (page 6-10) Identify specific measures that would be taken to protect the integrity of the pipeline in areas of active mining. Include a discussion of blasting and heavy equipment operation and excavation in proximity to the pipeline.
- 10. Appendix 6A (Table 6A-6) Provide a table footnote that identifies the difference between 'active' and 'producing'.
- 11. Appendix 6A (Table 6A-7) Update the table to report units for the Hypocentral Depth.

- 1. Section 7.2.8.1 (page 7-14) Provide the timing for post-construction restoration steps, including soil amendments and seeding for the portion of the route where dual 42-inch-diameter pipe would be installed.
- 2. Section 7.3.3 Update the section or states' Agricultural Impact Mitigation Plan to include a discussion of the post-construction monitoring of lands with drain tile lines/systems. Specifically, the discussion should include detail on the process of post-construction follow-up for landowners, i.e., how and who they can contact and the timing of repairs where issues may arise. Also, clarify whether or not the mitigation measures for drain tiles outlined in the Agricultural Impact Mitigation Plans would also be applied for drain tiles crossed in Pennsylvania and West Virginia.
- 3. Appendix 7A (Table 7A-2) Define or correct the title for the second column currently labeled 'Leh (miles)'.

4. Appendix 7A and Attachment 7A – Provide a table(s) detailing soil characteristics and/or acreage of impact for both temporary and permanent access roads, and contractor yards for soil limitations as they were provided in appendix 7A, table 7A1-1.

- 1. As previously requested on December 31, 2014:
 - a. RR8-8: The section states that the Project would cross federal, state, and private lands; however the table indicates no federal lands crossed. Clarify the discrepancy. Additionally, the table contains a footnote definition, but the footnote does not appear in the actual table.
 - b. RR8-10: Update the discussion on the Pinckney Recreation Area to include a discussion of seasonal restrictions for construction to avoid peak use of the area, impacts on any trails crossed by the Project or nearby parking/access points, and length of time trails would be closed due to construction of the Project.
- 2. Address the following Scoping Comments not addressed in the January filing:
 - a. C446-11: Comment raised concerns for impacts on lands within the "State of Michigan Farmlands and Open Spaces Preservation Program";
 - b. C1084-7: Comment raised concerns for impacts on the Baker Preserve, an under-construction Washtenaw County park that would be crossed by the Market Segment near MP 75.4;
 - c. Multiple comments including C378-3, C424-10, C630-1: Comments raised concerns for impacts on hunting in the Project area; and
 - d. C878-1 and C476-5: Comments raised concerns for impacts on specialty crops/uses such as sap production and raspberry, boysenberry, and wild grapes.
- 3. Section 8.1.2 (page 8-2) The section states permanent impacts from aboveground facilities would be 504.8 acres; however, appendix 8A-2 reports 510.89 acres. Clarify the discrepancy.
- 4. Section 8.1.2.2 (page 8-4) Clarify whether the entire site of each compressor station would be cleared within the fenced boundaries. If not, provide a detailed description for each site describing the modifications to existing land use types and resulting operational footprint (i.e., grass, gravel, etc.). Indicate where woody vegetation could be maintained around the site perimeter for noise and visual screening.

- 5. Section 8.1.3.4 (page 8-11) Update the residential land discussion to include Rover's plan for structures that are within the boundaries of the construction right-of-way (i.e. purchase structure or relocate structure). See question RR1-28 above.
- 6. Section 8.1.3.7 (page 8-13) Clarify the crossing method for the Timber Trace Gulf Club. The section states that it would be crossed using the HDD method, while appendix table 8A-4 lists the crossing method as "conventional."
- 7. Section 8.3 (page 8-17) Provide supporting information for the conclusion that no planned residential/commercial developments have been identified in the Project area. Provide copy of each appropriate correspondence and reference.
- 8. Section 8.4.6 (page 8-24) and table 8A-4 Update the section and table to include the New Life Fellowship Church. Update the appropriate Resource Reports to discuss potential impacts on the church (e.g., visual, noise, and traffic impacts).
- 9. Section 8.5.1 (page 8-25) Update the section to include a discussion of impacts on specific visual receptors such as recreators at nearby public lands and recreation areas, as well as residents in close proximity to the construction right-of-way.
- 10. Section 8.5.2 (page 8-26) Update the visual assessment to include a discussion on the visual impacts for each compressor station and meter station individually. Provide additional details on the "small satellite dish" mentioned in section 1.3.2.2 (i.e., installment height, specific locations [by MP], and any other associated components that would be required for operation/use of the satellite dishes).
- 11. Appendix 8A (Table 8A-2) Provide individual land use tables for each Project segment (i.e. for each of the nine laterals and each of the two mainlines for a total of 11 individual land use tables). The land use tables should include impacts for each land use category by Project Component (pipeline, aboveground facilities, ATWS, access roads, contractor yards), State, and County.
- 12. Appendix 8A (Table 8A -3) and appendix 8B Update the table and plans to address the following inconsistencies:
 - a. there are several structures listed in the table as having a Site-Specific Residential Plan; however, no plan is provided; and
 - b. the table and plans are inconsistent in noting structures intended for purchase by Rover.
- 13. Appendix 8B Update the plans as follows:
 - a. reconcile the discrepancy between the plans which note that there would be "no workspace closer than 8 feet to the home" and the site-specific

- residential plans depicting homes that are closer than 8 feet to construction workspace; and
- b. depict with an aerial imagery background.

- 1. As previously requested on December 31, 2014:
 - a. RR9-5c: Update the table 9.1-1 to include the type of compression for each compressor station;
 - b. RR9-5f: Update the section to include a discussion on venting greenhouse gases and volatile organic compounds during operations; and
 - c. RR9-9: Update the section to include the locations of all HDD entry and exit locations and the approximate time to complete each drill.
- 2. Address the following Scoping Comments not addressed in the January filing:
 - a. C836-7: Comment raised concerns for the effect of relief valve noise on commodity production (such as milk and eggs);
 - b. C838-9: Comment raised concerns for the effect of construction noise on training, disposition, and health of show horses located within 250 feet of construction;
 - c. Multiple comments including CH36: Comments raised concerns for radioactive compounds emitted into the air; and
 - d. DE-28: Comment raised concerns emissions from inadvertent industrial accidents.
- 3. General Update the section to include a discussion on climate change.
- 4. Section 9.2 Describe the likelihood of a pipeline blowdown event. This discussion should include the cause and frequency of a blowdown event, the approximate time it would take to evacuate gas from the pipeline, and the potential noise associated with the MLV based on an noise sensitive areas's (NSA) distance from the noise source.
- 5. Section 9.1.4.3 (page 9-18) As indicated in the section, provide air permit applications for all compressor stations, including details on applicable state rules and requirements for air quality control.
- 6. Section 9.1.4.4 (page 9-19) Update the section to include detailed AERMOD modeling results for all compressor stations.

- 7. Section 9.2.1.2 (page 9-23) Update the section to include an analysis of applicable state/county/local noise and vibration regulations in all areas of Project construction (including pipeline).
- 8. Section 9.2.2 (page 9-23) Update the section to include an equipment list, noise evaluation methodology, identification of NSA, baseline noise levels, and impact evaluations for the delivery metering stations where an NSA would be within 0.5 mile (in addition to compressor stations).
- 9. Sections 9.2.11.1 and 9.2.12.1 (pages 9-38 and 9-39) The sections indicate audible sound sources from Albaugh, New Washington, Brillhart and Ross Roads for Mainline Compressor Station 3 and the Defiance Compressor Station. Verify the accuracy of these statements and update the discussions as appropriate.
- 10. Section 9.2.16.1 (page 46) Note that the FERC target sound limit of 55 Aweighted decibels (dBA) is a 24-hour standard, not a nighttime standard.
- 11. Section 9.2.1.16.1 Update the section to state that effort would be made to mitigate noise <u>prior</u> to offering relocation.
- 12. Appendix 9A, Table 9.2.1-1 and other weather tables for noise surveys (page 9-116) Update the table to include the start time of the noise survey, and clarify whether the weather represents the start time or the entire duration of survey.
- 13. Appendix 9A, Table 9.2.1-2 and other baseline sound level monitoring result tables (page 9-118) Update the table to include the cutoff radius for identifying NSAs, (i.e. these are all NSAs within xx feet of a compressor station or other aboveground facility).
- 14. Appendix 9A (Tables 9A-9A through 9A-18A) Provide calculations and assumptions, emission factors and basis, fuel consumption rates, and annual operations in support of the criteria pollutant emissions estimates.

- 1. The no action alternative discussion should include the cost associated with other types of actions that are reasonably expected to occur.
- 2. Section 10.1 (page 10-7) Provide a brief discussion of data used and a summary of the comparison and description of any differences between the impact analysis present in RR10 and that of the other RRs.
- 3. Section 10.4 (page 10-15) Reconcile the number agreement in the section, "Two existing pipeline systems were evaluated to transport Project supplies: the

- Trunkline Gas Company (Trunkline) pipeline system, Vector Pipeline L.P. (Vector) pipeline system, and the TransCanada ANR East Pipeline System."
- 4. Section 10.4 (page 10-15) Update the section to include a discussion of potential systems alternatives for the following: Panhandle Eastern, Utica East Ohio Midstream (UEO also as a route alternative), Columbia Pipeline System, and REX East.
- 5. Section 10.4.2 (page 10-16) Update the Vector discussion to reflect the recent Transportation Agreement.
- 6. Section 10.5.2.1 (page 10-22) Update the section to provide a more detailed discussion of why the Sherwood West Alternate is not a viable alternative.
- 7. Section 10.5.2.1 (page 10-22), figure 10.5-1, and table 10.5-1 The section, table, and figure are inconsistent as to the crossing of public lands for this alternative. Update as appropriate to reconcile the discrepancy.
- 8. Section 10.5.2.2 (page 10-22) and table 10.5-2 The section and table are inconsistent regarding several resources associated with this alternative. Update as appropriate to reconcile the discrepancy.
- 9. Section 10.5.2.2 (page 10-22) Update the section to include a discussion on US 50 and CR 9 corridors as potential route alternatives.
- 10. Update the sections and tables as appropriate to reconcile the discrepancy regarding the percent collocation:
 - a. Section 10.5.2.3 (page 10-23) and table 10.5-3; and
 - b. Section 10.5.2.4 (page 10-23) and table 10.5-4.
- 11. Section 10.5.2.5 (page 10-23) and table 10.5-5 There are a significant number of tracts crossed by the proposed route; however, zero residences are reported as being within 50 feet. Verify this data.
- 12. Section 10.5.3.3 (page 10-26) Generate a comparison table for the portion of Mainline A and B (MP 6.0 to 182.0) and the corresponding NEXUS route that are described as being 20-30 miles apart. Update the text discussion accordingly.
- 13. Table 10.5-5 and figure 10.5-5 The table and figure are inconsistent regarding the crossing of public and protected lands. Update as appropriate to reconcile the discrepancy.

- 14. Section 10.6.1.1 (page 10-27) and table 10.6-1 The route variation as titled in the section is inconsistent with the route variation as titled in the table. Update the text and table to reconcile the discrepancy.
- 15. Section 10.6.2 (page 10-28) and tables 10.6-4 through 10.6-8 Update the tables and/or section discussion to reconcile the discrepancy with regard to the claim that the variations to be adopted would increase the pipeline routing to be adjacent to existing rights-of-way. The data in the tables shows that only one route variation (MP 67.99 to 81.75) offers a greater percent adjacent to existing right-of-way as compared to the corresponding segment of the proposed route.
- 16. Table 10.6-9 Provide a more detailed evaluation for each of the landowner concerns listed in the table. The analysis should be tied to and related to specific requests presented in the comments and conclusions substantiated with data. Also, several issues identified in review are as follows:
 - a. provide MP, town/state and tract number for all commenters in the table;
 - b. for comments where a tract number, town/state, or milepost were not identified, provide supporting information on how Rover was able to evaluate the requested variation if location information was not available;
 - c. for comment resolutions listed in the table as 'Proposed reroute not feasible", "Best route selected in area", and "Reroute not feasible due to constraints", provide additional detail to support these conclusions. The detail for each comment should identify the corresponding portion of the planned route, the proposed re-route to avoid (descriptive or in a figure, where applicable), and an explanation of why the re-route is not feasible and what specifically about the planned route makes it "best";
 - d. where landowners raised concerns based on specific resources or crossing location along their property, identify the resource and crossing location (i.e., start and end MP), and whether or not the resolution has been made to landowner satisfaction (i.e. if route is moved to parallel an existing right-of-way, resolution should indicate if reroute avoids area of landowner concern); and
 - e. resolutions that are conditioned based on survey permission should be revised and evaluated based on best available information. Since the proposed route was sited based on aerial imagery (and surveys have not been conducted), Rover should propose reroutes and evaluate resources with the same level of detail. Provide maps showing the route variations.
- 17. Sections 10.7 and 10.8 Update the sections to provide a more detailed discussion of the process by which a site was identified and the steps taken to determine if the

- site was a viable location. Also, update the sections to include comparison tables for all proposed and alternative sites containing relevant environmental factors.
- 18. Table 10.7-1(page 10-30) Update the table to include the Majorsville Compressor Station.
- 19. Section 10.7.1.2 (page 10-31) Update the section to discuss the two alternative sites for the Seneca Compressor Station depicted in figure 10.7-2.
- 20. Section 10.7.1.3 (page 10-31) Update the section to include an evaluation of the Clarington Alternate 3 in relation to the proposed location.
- 21. Section 10.8.1.5 (page 10-34) Provide a more detailed discussion regarding the Majorsville Meter Station Alternative, including an evaluation of why the proposed site was chosen over the alternative site.
- 22. Section 10.8.2.1 (page 10-34) Was an alternative site evaluated for the ANR Meter Station? If so, provide a discussion and figure. If an alternative site was not evaluated, provide a discussion on why no alternative was assessed.
- 23. Appendix 10A, Figures 10.5-1 through 10.5-11 Update the figures as follows:
 - a. include Project mileposts to provide relative location;
 - b. depict entire proposed and alternative routes;
 - c. include associated interconnector sites and compressor/meter stations;
 - d. consider use of different color lines to represent the various Project components (example figure 10.5-4 which depicts both the Berne and Seneca Laterals); and
 - e. consider an alternative background with more prominent features or include symbology for key environmental factors relative the respective alternative analyses (e.g., National Hydrography Dataset [NHD], National Wetlands Inventory [NWI] areas, public lands, cultural and historic resources).

- 1. As previously requested on December 31, 2014: RR11-2 Update the section to clearly state how Rover would monitor for further changes in population density around the pipeline with regards to Class.
- 2. Address the following Scoping Comments not addressed in the January filing:
 - a. C1168-10: Comment raises concerns for the ability of public service providers to meet demands of the Project and water sources for firefighters;

- b. C1156-8: Comment raises concerns for training and specialized equipment for first responders in the case of a pipeline emergency;
- c. DE-53: Comment raises concerns for stray voltage from the pipeline and potential impacts on his dairy cows; and
- d. C409-3: Comment raises concerns "BLACK ENERGY" and the potential for terrorists to gain control of our energy infrastructure.
- 3. Section 11.1.2 (page 11-4) Update the section to clearly state how Rover would monitor for further changes in population density around the pipeline with regards to Class.
- 4. Section 11.3.2 (page 11-12) Specify if MLV valve actuators would be remotely controlled.
- 5. Section 11.3.4 (page 11-13) Update the section to outline the safety and response measures that Rover would implement, per its emergency response plan, especially measures that may go beyond Department of Transportation/Pipeline and Hazardous Materials Safety Administration requirements.

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